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2 Federal Public Defender  
3 Nevada State Bar No. 11479  
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11 Attorney for William Kacensky

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13 **UNITED STATES DISTRICT COURT**  
14  
15 **DISTRICT OF NEVADA**

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17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 v.  
20 WILLIAM KACENSKY,  
21 Defendant.

22 Case No. 2:16-cr-00151-JCM-GWF

23  
24 **MOTION TO TEMPORARILY**  
**MODIFY CONDITIONS OF**  
**PRETRIAL RELEASE TO ALLOW**  
**TRAVEL**

25  
26 **(Expedited Treatment Requested)**

27 Certification: This Motion is timely filed.

28 The defendant, William Kacensky, by and through his attorney of record, Rachel  
29 Korenblat, Assistant Federal Public Defender, moves pursuant to 18 U.S.C. § 3145(a)(2) to  
30 temporarily modify his conditions of pretrial release to allow him to travel to San Diego and La  
31 Jolla, California from July 16-19, 2017 for a family trip. Mr. Kacensky's Pretrial Services  
32 Officer, Samira Barlow, does not oppose this request. This motion is based on all prior  
33 proceedings and the attached memorandum of points and authorities.

1 DATED this 11th day of July 2017.

2 RENE L. VALLADARES

3 Federal Public Defender

4 By: /s/ *Rachel Korenblat*

5 RACHEL KORENBLAT

6 Assistant Federal Public Defender

7 Attorney for William Kacensky

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## **Memorandum of Points and Authorities**

## **Factual Background**

On May 26, 2016, the Magistrate Judge released Mr. Kacensky on a Personal Recognizance Bond with pretrial release conditions, which included that he submit to location monitoring and that he remain in Clark County, Nevada. (ECF No. 9 at 3, 4.) Because Mr. Kacensky has been so compliant with his conditions, Pretrial Services and the government did not oppose his request to remove location monitoring as a condition at his change of plea hearing on October 21, 2016. (ECF No. 32.)

Mr. Kacensky remains in compliance. Mr. Kacensky seeks a Court order allowing him to travel to San Diego and La Jolla, California from July 16-19, 2017 with his wife and children to celebrate his wife's birthday.

Mr. Kacensky's Pretrial Officer, Samira Barlow, does not oppose this request.

## **Conclusion**

Based on the above, Mr. Kacensky respectfully requests this Court grant his motion to allow him to travel to San Diego and La Jolla, California.

DATED this 11<sup>th</sup> day of July, 2017.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

By: /s/ Rachel Korenblat  
RACHEL KORENBLAT  
Assistant Federal Public Defender  
Attorney for William Kacensky

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
WILLAM KACENSKY,  
Defendant.

Case No. 2:16-cr-00151-JCM-GWF

**ORDER TO TEMPORARILY MODIFY  
CONDITIONS OF PRETRIAL  
RELEASE TO ALLOW TRAVEL**

10 Based on the Motion to Temporarily Modify Conditions of Pretrial Release to Allow  
11 Travel (“Motion”), and good cause,

12 IT IS HEREBY ORDERED that the Motion is GRANTED. Mr. Kacensky may travel to  
13 San Diego and La Jolla, California from July 16, 2017 until July 19, 2017.

DATED this 11th day of July, 2017.

Jay A. Seer  
UNITED STATES MAGISTRATE JUDGE

## **CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on July 11, 2017 she served an electronic copy of the above and foregoing

**MOTION TO TEMPORARILY MODIFY CONDITIONS OF PRETRIAL RELEASE**  
**TO ALLOW TRAVEL (EXPEDITED TREATMENT REQUESTED)** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
KIMBERLY FRAYN  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ Karen Meyer  
Employee of the Federal Public Defender